

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: SHAWN C. STROOP and	:	CHAPTER 13
AMY R. STROOP	:	
Debtor(s)	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
SHAWN C. STROOP and	:	
AMY R. STROOP	:	
Respondent(s)	:	CASE NO. 1-21-bk-00708

TRUSTEE’S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 26th day of August, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. Debtor(s)’ plan violates 11 U.S.C. Sec. 1322(a)(1) in that the debtor(s) has not submitted all or such portion of the disposable income to the Trustee as required.
2. Trustee avers that debtor(s)’ plan is not feasible and cannot be administered due to the lack of the following:
  - a. 2020 Federal Income Tax return. (Second request)
3. The Trustee avers that debtors’ plan is not feasible based on the following:
  - a. Secured claims not in plan. (National Cooperative Bank – Claim #6; Ally Bank – Claim #13; ClearPath Lending – Claim #15)
  - b. Unfiled 2020 Federal Income Tax Return. (Claim #10)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.

- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 26th day of August, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John Hyams, Esquire  
2023 N. 2<sup>nd</sup> Street, Suite 203  
Harrisburg, PA 17102

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee